



Telephone Conversation Record

Allegheny County Health Department			
Date:	July 12, 2018	Time:	2:00 pm
Initiated by:	David Talley - EPA		
Received by:	JoAnn Truchan, P.E. - ACHD		
Subject:	EPA 105 Grant Quarterly Call		

1. Status of ACHD Title V permitting
 - Two Permits in public comment, Imperial Landfill & Kelly Run Sanitation
 - EPA has comments on the Ashland proposed permit, to be discussed at a later time.

Action Item: Discuss EPA comments to proposed Ashland permit.
2. Status of ACHD responses to deliverables in the EPA 2017 Title V audit
 - J.T. to send a copy of the ACHD 3-Year Plan to D.T.
 - ACHD currently working with a work-flow consultant to develop a quantitative methodology for determining appropriate staffing levels.

Action Item: JoAnn to send Dave copy of 3-year plan.
3. RACT update
 - J.T. interviewed a candidate on 07/11 for a part-time position dedicated exclusively to RACT. He begins on 07/23.
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4. RMP-Only sources
 - There doesn't seem to be any requirement Article XXI to meet the EPA RMP requirements if no other permit is necessary, and D.T. does not know of any other states that issue RMP-only permits.
 - ACHD is not clear if the full language for Part 68 needs to be included in Title V permit, or if the reference to it in the Site-Level conditions

Action Item: Dave to get back to ACHD with whether or not full language is required.
5. ATI – After re-evaluating their emissions (based on actual stack test data), can they go back through their last few years' emissions inventory and adjust upward (including paying the fee differences plus interest)? They claim they have a precedent for doing so in Pennsylvania, albeit not in Allegheny County.
 - The 114 letter should be send in mid-August. The EPA Enforcement group is still reviewing information sent by the ACHD Enforcement group.
 - D.T. not sure about the validity of changing Emissions Inventory numbers, and would like to see ATI's precedent.
 - An increase in emissions inventory numbers may not have much of an effect on the NSR/PSD analysis if they exceed the current permit limits.
 - Limits were incorrectly calculated in 2002.
 - 2002 permit also did not take into account gaseous emissions from canopy hood baghouses.

- A consent order included a compliance plan to correct emissions limits.
- This is what triggered NSR/PSD.
- For the lookback period, the only creditable emissions numbers are the incorrect emissions inventory numbers.

Action Item: JoAnn to send Dave a copy of the timeline from ATI once that becomes available.

Action Item: Dave to set up regular phone meetings to discuss ATI.

Action Item: Dave to look into validity of changing emissions inventory numbers and the effect this versus the current permit limits will have on the NSR/PSD analysis.

6. Neville Island Terminal/Gulf Oil – Testing

- Currently there are two separate TVOPs, one that requires testing every 2 years and one that requires testing every 5.
- The facilities are going to be combined, and it is ACHD's intention to put the testing on a 5-year schedule, but the deadline for the 2-year testing is coming up in September. The permit will not be issued before then.
- Technically the facility is required to meet the conditions in the current permit.

Action Item: ACHD will write a memo indicating our intention to change the permitting requirements. ACHD will also contact EPA Enforcement for further guidance.

7. Neville Island Terminal/Gulf Oil – NSR/PSD Applicability

- Since the equipment and processes of the Gulf Oil permit are going to be added to the Neville Island Terminal Permit, will this be considered an increase under NSR/PSD?
- Dave doesn't think so, but will verify.

Action Item: Dave to verify NSR/PSD applicability to the combination of two TVOPs.